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CLERK OF COURT  
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DISTRICT OF MASS.  
UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

INEZ GILCHRIST,

Plaintiff,

v.

LIBERTY MUTUAL INSURANCE  
COMPANY,

Defendants.

Civil Action No.: 04 10638 RGS

**JOINT MOTION TO STAY**

The parties in the above referenced matter hereby move the Court to stay this case. In support of this motion, the parties state the following:

1. The parties have agreed that Defendant Liberty Life Assurance Company of Boston<sup>1</sup> will conduct a further review of Plaintiff's claim for short-term disability benefits beyond the date for which she previously received benefits. If short-term disability benefits are found payable to Plaintiff for the entire period covering her short-term disability, pursuant to the policy, Defendant will then review Plaintiff's claim for long-term disability benefits.

2. The parties agree and request that Liberty Life shall have ninety (90) days from the date this motion is allowed to conduct this further review and to render a determination regarding Plaintiff's claim for short-term disability benefits beyond those benefits that have already been granted.

3. The parties further agree and request that should short-term disability benefits be found payable in their entirety, Defendant will then have ninety (90) days from the

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<sup>1</sup> Incorrectly named as Liberty Mutual Insurance Company.

final determination of her claim for short-term disability benefits to conduct a review of Plaintiff's claim for long-term disability benefits.

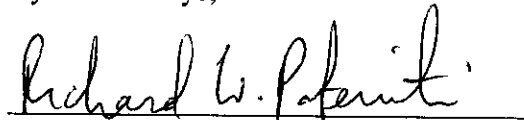
4. Should Defendant require additional time to make its determination, it will consult with Plaintiff and make requests to the Court for the Court's approval, as appropriate. Further, the above time periods for the determination on Plaintiff's claim for short-term and long-term disability benefits does not include time periods for appeals for these determinations that may be made by Plaintiff.

WHEREFORE, the parties respectfully request that this Court stay this present action pending a further review and determination by Defendant of Plaintiff's claim for short-term and long-term disability benefits, which may obviate the need for further proceedings in this matter.

Respectfully submitted,

LIBERTY LIFE ASSURANCE COMPANY OF  
BOSTON

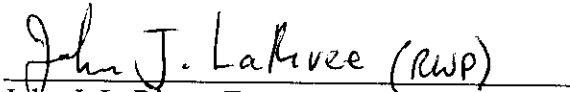
By its attorneys,



Andrew C. Pickett, BBO# 549872  
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Dated: June 24, 2004

Inez Gilchrist,  
By her attorney,



John J. LaRivee, Esq.  
21 Wingate Street, 105  
Haverhill, MA 01832

June 24, 2004

**CERTIFICATE OF SERVICE**

I hereby certify that on this day a true copy of  
the above document was served upon the  
attorney of record for each party by mail/by hand.

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Date: 6/24/04 